Section 1. Registration Information

Source Identification

Facility Name:	Johnson Matthey Inc.
Parent Company #1 Name:	Johnson Matthey Plc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	03-May-2021
Postmark Date:	03-May-2021
Next Due Date:	03-May-2026
Completeness Check Date:	03-May-2021
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0004 3302
Other EPA Systems Facility ID:	08066JHNSN2001A
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	73679672
Parent Company #1 DUNS:	2326734
Parent Company #2 DUNS:	2326734

Facility Location Address

Street 1:	2001 Nolte Drive
Street 2:	
City:	West Deptford
State:	NEW JERSEY
ZIP:	08066
ZIP4:	
County:	GLOUCESTER

Facility Latitude and Longitude

Latitude (decimal):	39.816389
Longitude (decimal):	-075.210556
Lat/Long Method:	Public Land Survey - Section
Lat/Long Description:	Facility Centroid
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Johnson Matthey Inc.
Operator Phone:	(856) 384-7000

Mailing Address

Operator Street 1:	2001 Nolte Drive
Operator Street 2:	
Operator City:	West Deptford
Operator State:	NEW JERSEY
Operator ZIP:	08066
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Rich Fackler
RMP Title of Person or Position:	Senior Env Compliance Engineer
RMP E-mail Address:	Richard.Fackler@jmusa.com

Emergency Contact

Emergency Contact Name:	Chris Schmid
Emergency Contact Title:	H&S Manager
Emergency Contact Phone:	(856) 579-1335
Emergency Contact 24-Hour Phone:	(856) 217-7007
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	Christopher.Schmid@matthey.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(856) 384-7000
Facility or Parent Company WWW Homepage Address:	www.matthey.com

Local Emergency Planning Committee

LEPC:	West Deptford Twp LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	563
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:	55788

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	24-Sep-2020
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	
Preparer Phone:	
Preparer Street 1:	
Preparer Street 2:	
Preparer City:	
Preparer State:	
Preparer ZIP:	
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000116105
Description:	Chlorine dissolving sys
Process Chemical ID:	1000145134
Program Level:	Program Level 3 process
Chemical Name:	Chlorine
CAS Number:	7782-50-5
Quantity (lbs):	48000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000116105
Process NAICS ID:	1000117497
Program Level:	Program Level 3 process
NAICS Code:	33141
NAICS Description:	Nonferrous Metal (except Aluminum) Smelting and Refining

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000093842

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's OCA Guidance Reference Tables or Equations
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000099758

Percent Weight:	100.0
Physical State:	Gas
Model Used:	EPA's OCA Guidance Reference Tables or Equations
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	Yes
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

Accident History ID: 1000072337

Date of Accident:	18-Mar-2019
Time Accident Began (HHMM):	1500
NAICS Code of Process Involved:	33141
NAICS Description:	Nonferrous Metal (except Aluminum) Smelting and Refining
Release Duration:	000 Hours 30 Minutes

Release Event

Gas Release:	Yes
Liquid Spill/Evaporation:	
Fire:	
Explosion:	
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	
Piping:	Yes
Process Vessel:	
Transfer Hose:	
Valve:	
Pump:	
Joint:	
Other Release Source:	

Weather Conditions at the Time of Event

Wind Speed:	
Units:	
Direction:	
Temperature:	
Atmospheric Stability Class:	
Precipitation Present:	
Unknown Weather Conditions:	Yes

On-Site Impacts

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage ($):	0

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0

Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage ($):	0

Environmental Damage

Fish or Animal Kills:	
Tree, Lawn, Shrub, or Crop Damage:	
Water Contamination:	
Soil Contamination:	
Other Environmental Damage:	

Initiating Event

Initiating Event:	Equipment Failure

Contributing Factors

Equipment Failure:	Yes
Human Error:	
Improper Procedures:	
Overpressurization:	
Upset Condition:	
By-Pass Condition:	
Maintenance Activity/Inactivity:	
Process Design Failure:	
Unsuitable Equipment:	
Unusual Weather Condition:	
Management Error:	
Other Contributing Factor:	

Off-Site Responders Notified

Off-Site Responders Notified:	No, not notified

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:	Yes
Revised Maintenance:	Yes
Revised Training:	
Revised Operating Procedures:	Yes
New Process Controls:	
New Mitigation Systems:	Yes
Revised Emergency Response Plan:	
Changed Process:	
Reduced Inventory:	
None:	
Other Changes Introduced:	

Confidential Business Information

CBI Claimed:	

Chemicals in Accident History

Accident Chemical ID:	1000058474
Quantity Released (lbs):	1
Percent Weight:	100.0
Chemical Name:	Chlorine
CAS Number:	7782-50-5
Flammable/Toxic:	Toxic

Section 7. Program Level 3

Description

Chlorine system

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000124507
Chemical Name:	Chlorine
Flammable/Toxic:	Toxic
CAS Number:	7782-50-5

Process ID:	1000116105
Description:	Chlorine dissolving sys
Prevention Program Level 3 ID:	1000099340
NAICS Code:	33141

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	17-Mar-2021

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	17-Mar-2021

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	30-Dec-2022

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	Yes
Increase in Chemical Inventory:	
Change Process Parameters:	Yes

Installation of Process Controls:	Yes
Installation of Process Detection Systems:	Yes
Installation of Perimeter Monitoring Systems:	Yes
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	16-Mar-2021

Training

Training Revision Date (The date of the most recent review or revision of training programs):	19-Mar-2021

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer based training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	06-Jan-2021
Equipment Inspection Date (The date of the most recent equipment inspection or test):	26-Apr-2021
Equipment Tested (Equipment most recently inspected or tested):	chlorine building hoist

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	10-Feb-2021
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	21-Jan-2021

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	14-Jan-2021

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	22-Mar-2021
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Dec-2021

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	22-Mar-2019
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	31-Dec-2020

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	13-Jul-2020

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	02-Apr-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	06-May-2020
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	21-Oct-2020

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	18-Jan-2021

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	31-May-2020

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	West Deptford Twp LEPC
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(856) 845-2300

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

At the Johnson Matthey facility in West Deptford, NJ, we are committed to operating and maintaining all of our processes in a safe and responsible manner. We use a combination of accidental release prevention programs and emergency response planning programs to help ensure the safety of our employees and the public as well as protection of the environment. This document provides a brief overview of the comprehensive risk management activities that we have designed and implemented, including:

* A description of our facility and use of substances regulated by EPA's RMP regulation.
* An overview of our accidental release prevention programs.
* A five-year history for accidental releases of chemicals regulated by EPA's RMP rule.
* An overview of our emergency response program.
* An overview of planned improvements at the facility to help prevent accidental chemical releases from occurring and adversely affecting our employees, the public and the environment.

STATIONARY SOURCE AND REGULATED SUBSTANCES

The Johnson Matthey facility manufactures chemical products containing platinum group metals. These products are commonly referred to as homogeneous and heterogeneous catalysts and other specialty chemical compounds. Spent materials containing precious metals are also processed and refined to the pure element using a variety of chemicals and processing operations. Our processes use the following chemical that EPA has identified as having the potential to cause significant offsite consequences in the event of a substantial accidental release:

Toxics: Chlorine

Chlorine is stored in one ton cylinders as a pressurized liquid. The liquid chlorine is vaporized to a gas, which is distributed to the manufacturing area and used in our processes for dissolution of precious metals.

Our accidental release prevention programs, in effect since 1988, and our contingency planning efforts allow us to effectively manage the hazards that are posed to our employees, the public, and the environment by our use of this chemical.

GENERAL ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

We take a systematic, proactive approach to preventing accidental releases of hazardous chemicals. A management system has been prepared which includes overseeing the implementation of the elements of our risk management program. As part of our system, roles and responsibilities have been assigned to facility personnel. Our system also addresses each of the key features of a successful prevention program including:

* Process safety information
* Process hazard analysis
* Operating procedures
* Training
* Mechanical integrity
* Management of change
* Pre-startup review
* Compliance audits
* Incident investigation
* Employee participation
* Hot work permit
* Contractors

As part of our prevention efforts, we have implemented the following chemical-specific prevention steps:

* Building enclosure for vaporizing process.

* Monitoring devices to activate a ventilation system in the building with exhaust air venting to a scrubbing system.
* Monitoring devices in cylinder storage area and manufacturing process areas with automatic shutdown of the chlorine system.
* Excess flow detection with automatic shutdown of the system.
* Remotely operated shutoff valves.
* Preventive maintenance programs for process equipment and piping.
* Hazards analysis

These individual elements of our prevention program work together to prevent accidental chemical releases. Johnson Matthey and its employees are committed to the standard that these management systems set and we have specific accountabilities and controls to ensure that we are meeting our standards for accident prevention.

FIVE-YEAR ACCIDENT HISTORY

We keep records for all significant accidental chemical releases that occur at our facility. There has been accidental chemical releases involving materials covered under EPA's RMP rule during the past five years. The release involved chlorine of less than a pound which occurred in March 2019.

EMERGENCY RESPONSE PROGRAM

We have developed and maintain a comprehensive emergency response plan. Our plan, written to meet the New Jersey Toxic Catastrophe Prevention Act, consolidates all of the various federal, state, and local regulatory requirements. Relevant site personnel are trained on the plan's contents and it is coordinated with the community emergency response plan.

In addition, we maintain an emergency response team on site. The team is trained and properly equipped to respond to hazardous material releases and specifically chlorine. The team trains on a periodic basis, which includes a minimum of one simulated drill per year in conjunction with local fire, rescue and emergency management agencies.

Our overall program provides the essential planning and training for effectively protecting workers, the public and the environment during emergency situations.

PLANNED CHANGES TO IMPROVE SAFETY

The chlorine safety systems have evolved to the current level over the many years that the New Jersey accidental release program (TCPA) has been in effect. The facility continues to evaluate systems to enhance process safety. Overall usage has been reduced due to process optimization.